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June 14, 2022

VIA ECF

Hon. Analisa Torres
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, New York 10007

Re: *J.S. v. N.Y.C. Dep't of Education*, 22-cv-4097 (AT)(BCM)

Dear Judge Torres:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, the Hon. Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action, wherein Plaintiffs seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.*, as well as for this action.

I write to respectfully request i) a 60-day extension of Defendant's time to answer, from June 10, 2022 to August 10, 2022, and ii) that the deadline for filing the joint letter and proposed Case Management Plan/Scheduling Order be extended from July 22, 2022 to September 22, 2022. Plaintiff timely consented to this request. I sincerely apologize to the Court for the delay in filing this request. I was just assigned to this matter earlier today due to an administrative oversight.

This is the first request for an extension. The requested extension will provide Defendant with time to review the billing records provided and make a request for settlement authority to the Office of the N.Y.C. Comptroller. We are hopeful that the parties will settle this matter without the need for further burden on the Court's time.

Accordingly, Defendant respectfully requests a 60-day extension of its time to answer and that the the deadline for filing the joint letter and proposed Case Management Plan/ Scheduling Order be extended to September 22, 2022.

Thank you for considering these requests.

Respectfully submitted,

/s/

Martha Nimmer
Special Assistant Corporation Counsel

cc: Gary Mayerson, Esq. (via ECF)

GRANTED.

SO ORDERED.

Dated: June 14, 2022
New York, New York



ANALISA TORRES
United States District Judge